

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-12076
Emma Shaw-Camara AKA Emma	:	Chapter 13
Shaw, AKA Emma Camara, AKA	:	Judge Magdeline D. Coleman
Emma Stroud	:	*****
Debtor(s)	:	

**OBJECTION OF WELLS FARGO BANK, N.A., D/B/A WELLS FARGO AUTO
TO CONFIRMATION OF THE PLAN (DOCKET NUMBER 14)**

Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Emma Shaw-Camara AKA Emma Shaw, AKA Emma Camara, AKA Emma Stroud ("Debtor") as follows:

1. Creditor holds a security interest secured by a lien on Debtor's personal property commonly known as a 2008 Mitsubishi Lancer with the Vehicle Identification Number JA3AU26U58U029902 ("Property").
2. Creditor has filed Proof of Claim number 3 in the amount of \$3,866.60.
3. Debtor's Plan seeks to improperly cramdown Creditor's lien to a secured value of \$955.00.
4. As of the bankruptcy petition filing date, Creditor believes the Property had a value of \$4,400.00.
5. Pursuant to 11 U.S.C. §506, Creditor is entitled to a secured claim based on the replacement value of the property on the date the bankruptcy was filed.
6. Creditor therefore asserts that its claim should be paid as filed.
7. Creditor requests an opportunity to conduct an appraisal, if such becomes necessary.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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Emma Stroud : *********
: *********
: *********
Debtor(s)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Zachary Perlick, Attorney for Emma Shaw-Camara, 1420 Walnut Street, Suite 718,
Philadelphia, PA 19102, Perlick@verizon.net

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 21, 2019:

Emma Shaw-Camara AKA Emma Shaw, AKA Emma Camara, AKA Emma Stroud, 6025
Walton Avenue, Philadelphia, PA 19143

DATE: May 21, 2019

/s Karina Velter

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